

5 Q. So what did you mean by anybody that  
6 discovered it?

7 A. Commissioner Clark could have discovered  
8 some, Dale could have discovered some. Beyond that,  
9 I don't know.

10 Q. Why were you meeting with Mr. Oldham to  
11 discuss these splits?

12 MR. RUSSO: Counsel, let me interpose an  
13 objection just to remind the witness not the  
14 disclose privileged communications between  
17 answer without disclosing those communications, you  
18 can answer.

19 A. Could you repeat the question?

20 Q. Sure. Why were you meeting with him and  
15 Mr. Oldham to the extent there were attorney-client  
16 privileged discussions. But to the extent you can  
21 Mr. Oldham to discuss these conflicts?

22 MR. RUSSO: Same objection.

23 A. I'm going to take the advice of my  
24 counsel.

25 MS. JAYARAMAN: Sure. Cathy, can you pull  
UNEDITED, UNPROOFREAD, UNCORRECTED, UNCERTIFIED  
ROUGH DRAFT

65

1 up Tab 6, please.

2 (Exhibit no. marked)